

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

DAVITA M. KEY,

Plaintiff,

v.

HYUNDAI MOTOR
MANUFACTURING, ALABAMA,
LLC; HYUNDAI ENG AMERICA,
INC.; and DYNAMIC SECURITY,
INC.

Defendants.

Case No. 2:19-CV-767-ECM

PLAINTIFF'S WILL USE EXHIBIT 34

Davita Key

From: Sherry Spires (sspires@dynamicsecurity.org)

To: rcureton@dynamicsecurity.org

Cc: klriddle@dynamicsecurity.org

Date: Tuesday, August 22, 2017 at 03:46 PM CDT

Ray: I received an unemployment claim today. Any update on her since your statement of 8/14/17?

Kristal: With the EEOC Charge out there, we probably need to be "on the same page" with our response. Your thoughts, please.

Thanks,
Sherry

Davita Key

From: Sherry Spires (sspires@dynamicsecurity.org)

To: nscavella@dynamicsecurity.org; rcureton@dynamicsecurity.org

Date: Tuesday, August 22, 2017 at 04:13 PM CDT

Nicole: Please send me Rules and Regulations for Security Officers (1st and 2nd page) and Acknowledgment of Handbook from her file.

Ray: I also need the Job Refusal forms for all the assignments you offered her which she refused.

Our response is due August 28.

Thanks,
Sherry

Re: Davita Key

From: Nicole Scavella (nscavella@dynamicsecurity.org)

To: sspires@dynamicsecurity.org

Date: Wednesday, August 23, 2017 at 08:33 AM CDT

Good morning, Ma'am.

Ray is going to be out of the office until late today. He wanted me to let you know that we will compile the documents you have requested regarding, Ms. Key and forward to you no later than tomorrow morning. As for Mr. White, I will forward those documents shortly. Please let me know if you need anything else.

Thank you,

Nicole Scavella

From: Sherry Spires <sspires@dynamicsecurity.org>

To: Nicole Scavella <nscavella@dynamicsecurity.org>; Ray Cureton <rcureton@dynamicsecurity.org>

Sent: Tuesday, August 22, 2017 4:13 PM

Subject: Davita Key

Nicole: Please send me Rules and Regulations for Security Officers (1st and 2nd page) and Acknowledgment of Handbook from her file.

Ray: I also need the Job Refusal forms for all the assignments you offered her which she refused.

Our response is due August 28.

Thanks,
Sherry

Re: Davita Key

From: Sherry Spires (sspires@dynamicsecurity.org)

To: klriddle@dynamicsecurity.org

Date: Wednesday, August 23, 2017 at 09:15 AM CDT

I sure will! :)

From: Kristal Riddle <klriddle@dynamicsecurity.org>
To: Sherry Spires <sspires@dynamicsecurity.org>
Sent: Wednesday, August 23, 2017 9:06 AM
Subject: Re: Davita Key

Perfect. If you get those job refusals, will you make sure a copy finds its way to me as well? I could use them in my response too.

Thanks!
Kristal

From: Sherry Spires <sspires@dynamicsecurity.org>
To: Kristal Riddle <klriddle@dynamicsecurity.org>
Sent: Wednesday, August 23, 2017 9:03 AM
Subject: Re: Davita Key

Sounds good to me! I will also include with my response the documented Job Refusals that Ray said he would send to me on August 14 - which he never did. I've asked for them again and Nicole indicated he would send them by tomorrow morning. I also plan to include with my response: Section 3 (Job Assignments) from S/O Handbook as well as Rules and Regs and refer to Job Assignments on Page 2.

Thanks!
Sherry

From: Kristal Riddle <klriddle@dynamicsecurity.org>
To: Sherry Spires <:sspires@dynamicsecurity.org>
Sent: Wednesday, August 23, 2017 8:49 AM
Subject: Re: Davita Key

Sherry,

"She was removed from her original assignment for refusal to comply with the client's grooming policy re: dreadlocks and has rejected all Dynamic's efforts to place at other work sites in the area."

That's the language I would go with; it's a very shortened version of what I'm replying to EEOC with.

Thanks!
Kristal

From: Sherry Spires <:sspires@dynamicsecurity.org>
To: Ray Cureton <rcureton@dynamicsecurity.org>
Cc: Kristal Riddle <klriddle@dynamicsecurity.org>
Sent: Tuesday, August 22, 2017 3:46 PM
Subject: Davita Key

Ray: I received an unemployment claim today. Any update on her since your statement of 8/14/17?

Kristal: With the EEOC Charge out there, we probably need to be "on the same page" with our response. Your thoughts, please.

Thanks,
Sherry